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18 *Attorneys for Defendant Keefe Commissary Network,
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20
21 **IN THE UNITED STATES DISTRICT COURT**

22
23 **FOR THE DISTRICT OF NEVADA**

24 JOHANA REYES,

25 Plaintiff,

26 vs.

27 KEEFE GROUP, LLC and DOE Defendants
28 I-X,

29 Defendants.

30 Case No.: 3:18-cv-00004-LRH-WGC

31 ;
32 **UNOPPOSED MOTION TO EXTEND
33 DEFENDANT'S DEADLINE TO RESPOND
34 TO COMPLAINT AND
35 ORDER**

36 **[FIRST REQUEST]**

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38 Defendant Keefe Commissary Network, LLC (incorrectly identified in the Complaint as
39 Keefe Group, LLC ("Keefe"), by and through its counsel, Armstrong Teasdale LLP, hereby
40 respectfully requests an extension of Keefe's deadline to respond to the Complaint from February 7,
41 2018, to **March 5, 2018**. Plaintiff Johana Reyes ("Reyes") has consented to the requested extension.
42 This is the first request to extend this particular deadline.

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44 On January 4, 2018, Reyes filed her Complaint against Keefe alleging claims for sexually
45 hostile work environment, disability discrimination, and retaliation. *See* ECF No. 1. The Summons

1 and Complaint were served on Keefe on January 17, 2018. *See* ECF No. 4. Therefore, pursuant to
2 Rule 12(a) of the Federal Rules of Civil Procedure, Keefe's response to the Complaint is due on
3 February 7, 2018.

4 On February 5, 2018, undersigned counsel contacted Reyes' counsel to discuss stipulating to
5 extend Keefe's response deadline. Reyes' counsel agreed to continue Keefe's answer deadline from
6 February 7, 2018, to March 5, 2018. Counsels, however, were not able to agree on language for a
7 stipulation, therefore, Keefe files this unopposed motion.

8 Good cause for this extension exists. Counsel for Keefe was recently retained, and therefore,
9 requires additional time to adequately review and consider this matter in anticipation of responding
10 to the Complaint. This short extension will not prejudice any parties nor affect any current deadlines
11 because this case is still in its infancy – no parties have answered the Complaint and a case
12 management order had not been entered. This stipulation is entered into in good faith and is not
13 intended to unduly delay the proceedings.

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1 Accordingly, Keefe requests that an order be entered extending the deadline for Keefe to
2 respond to the Complaint from February 7, 2018, to **March 5, 2018**.

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4 Dated this 7th day of February, 2018.

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6 ARMSTRONG TEASDALE, LLP

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10 By: /s/ Michelle D. Alarie
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24 *Attorneys for Defendant Keefe Commissary*
25 *Network, LLC*

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28 **ORDER**

1 **IT IS SO ORDERED.**

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4 UNITED STATES MAGISTRATE JUDGE

5 DATED: February 7, 2018